

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JONATHAN ZUHOVITZKY,

Plaintiff,

v.

THE UNITED STATES OF AMERICA; THE
UNITED STATES DEPARTMENT OF THE
TREASURY; THE UNITED STATES
INTERNAL REVENUE SERVICE; FHIRDOS
KHATIB (in her Capacity both as a Federal
Employee and Individually); and JENNIFER
SAWYER (in her capacity both as a Federal
Employee and Individually),

Defendants.

No. 20 Civ. 4937 (JGK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss and for Summary Judgment, Defendants' Rule 56.1 Statement of Undisputed Material Facts, the Declaration of Nancy M. Beasley, the Declaration of Firdosa Khatib, the Declaration of Jennifer R. Sawyer, and accompanying exhibits, Defendants the United States of America, United States Department of the Treasury, United States Internal Revenue Service, Firdosa Khatib, and Jennifer Sawyer, by their attorney, Audrey Strauss, Acting United States Attorney for the Southern District of New York, hereby move this Court for an order granting summary judgment in part to Defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure and dismissing the Complaint in part pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Dated: December 18, 2020
New York, New York

Respectfully Submitted,

AUDREY STRAUSS
Acting United States Attorney
Southern District of New York

By: /s/ Lucas Issacharoff
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